



# Oregon

John A. Kitzhaber, MD, Governor

## Department of Environmental Quality

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### Filed Electronically

Mr. Ray LaHood, Secretary  
U.S. Department of Transportation  
1200 New Jersey Ave, SE  
Washington, D.C. 20590

Mr. Ken Blodgett  
Surface Transportation Board  
395 E Street SW  
Washington, D.C. 20423

**Re: Tongue River Railroad Environmental Impact Statement (EIS) Scoping Comments  
for Docket No. FD 30186**

Dear Mr. LaHood and Mr. Blodgett:

The State of Oregon is pleased to provide comments regarding the appropriate scope of the environmental impact statement (EIS) being prepared regarding the Tongue River Railroad proposal. This EIS is particularly important because, though the ultimate destination of the coal to be transported by this proposed railroad is not disclosed, recent coal export facility proposals in Oregon and Washington make it highly likely that the ultimate destination will be Asia, via such proposed facilities. Despite the existence of these concrete export plans, no federal agency has yet prepared an EIS that addresses the full impacts associated with coal export to Asia. Given the potential significant environmental impacts of such proposals upon this State, we request that you consider the following scoping comments in determining the extent of your forthcoming EIS to sufficiently inform decision makers and the public of these impacts as well as the reasonable alternatives that would avoid or minimize adverse impacts.

The current proposals for coal export facilities in Oregon and Washington could result in an *additional 157 million tons* of coal exports through our states, more than doubling the U.S. coal export capacity. Unfortunately for the citizens of Oregon and Washington, most of the environmental, community, economic, and transportation impacts associated with this tremendous increase in coal export would fall on these states. This EIS must, therefore, adequately disclose and analyze *all* direct, indirect, and cumulative impacts of the project, including the potential impacts on Oregon's lands and state waters. See 40 C.F.R. §§ 1508.7, 1508.25(a)(2).

These impacts include the air-quality impacts of increased or extended use of coal to generate electricity in Asia as well as the increased greenhouse gas emissions from the transport to and combustion of coal in Asia. Coal-fired energy production in Asia has been directly linked to increases in air pollution on the west coast of the United States. Studies show that 84 percent of the mercury in the Columbia River basin is due to atmospheric deposition from global sources and 18 percent of mercury deposition recorded at one Oregon site can be traced to anthropogenic sources in Asia. Over the long term, these transported emissions could lead to economic as well as environmental and health impacts in our states, triggering additional costs in emissions controls for U.S. industries. The air quality impacts of the transport and use of Powder River coal in Asia, as well as resulting socioeconomic impacts, should be explored in this EIS.

Additionally, we are deeply concerned about the impacts of increased coal train traffic running through Oregon communities. An estimated *157 million tons* of coal moving through the region's rail system would significantly affect the transport of other export commodities and negatively impact plans to increase passenger rail. We are particularly concerned about a substantial increase in rail traffic through the Columbia Gorge National Scenic Area, where train noise, air emissions and coal dust could adversely affect the recreational and visual values protected by federal law.

The proposed project could also cause significant vessel traffic impacts on the Columbia River. The Columbia River is a confined system, and the proposals could result in a 70% increase in ship traffic. The Columbia River has multiple ports, a breaking coastal bar at the entrance, and no federal vessel traffic system, all of which create significant potential for risk. Vessel traffic impacts from the proposals could be significant, and need to be analyzed in this EIS. Although CEQ regulations state that "economic or social effects are not intended by themselves to require preparation of an environmental impact statement," in this instance the economic and social effects are interrelated with the impacts on the physical environment such that this EIS should discuss all such impacts resulting from increased rail traffic as well as increased vessel traffic along the Columbia. *See* 40 C.F.R. § 1508.14.

We further request that the EIS comprehensively address the following issues:

- Coal dust emissions at the facilities and during product transport, and the potential environmental impacts of compounds utilized to suppress dispersal of coal dust, if proposed;
- Emissions of other air pollutants, including diesel particulate, ozone, NO<sub>x</sub>, SO<sub>2</sub>, mercury, and greenhouse gases associated with transport to and use of coal outside of the United States; and
- Substantial increases in train traffic -- perhaps as many as 63 mile-long coal trains per day, and resulting noise and delay times for communities along the proposed rail lines, including emergency vehicles at rail crossings, and the associated socioeconomic impacts.

Discussion and disclosure of all of these impacts will fill significant information gaps that will benefit our nation, our states, and our communities. Since federal agencies will be making decisions whether to allow this proposed project to go forward, and because the impacts of the

projects cross state boundaries, it is your responsibility to step up and sufficiently perform careful analysis to disclose *all* associated environmental impacts.

The United States has the largest proven coal reserves in the world. Developing, transporting and using this resource for energy production in Asia will have significant implications for the trajectory of the world's transition to cleaner sources of energy and for our nation's energy security, as well as localized economic and environmental effects in our state. We commend your decision to prepare this EIS, and strongly urge you to continue to take seriously your responsibility to make an informed decision by developing and creating a thorough, sufficient EIS that takes a comprehensive look at the energy, environmental, and public health impacts of this proposal before you commit the United States to this path.

Thank you for your consideration. We look forward to working with you throughout this environmental review process.

Respectfully,

A handwritten signature in dark ink, appearing to read "Dick Pedersen". The signature is fluid and cursive, with a large initial "D".

Dick Pedersen, Director  
Oregon Department of Environmental Quality

cc: Lt. Gen. Thomas Bostick, U.S. Army Corps of Engineers  
Sec. Ken Salazar, U.S. Department of the Interior  
Mike Pool, Bureau of Land Management  
Dennis McLerran, U.S. Environmental Protection Agency, Region 10  
Nancy Sutley, White House Council on Environmental Quality  
Paula Zahn, Washington Department of Ecology  
Richard Whitman, Oregon Governor's Natural Resources Advisor